

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

PATRICE WOLFE,

*

Plaintiff,

*

v.

* Civil Court Action No: L02 CV-3965

MED-TEL INTERNATIONAL
CORPORATION,

*

Defendant.

*

* * * * *

JOINT MOTION TO EXTEND DISCOVERY

Plaintiff Patrice Wolfe and Defendant Med-Tel International Corporation jointly move this Court for an Order extending the existing discovery deadline in this case from February 26, 2004 to March 31, 2004, and to extend subsequent deadlines accordingly. In support of this Motion, the parties state as follows:

1. The existing discovery deadline in this case is February 26, 2004.
2. The parties have diligently engaged in discovery in this matter; however, the workload and schedules of the attorneys and the schedules of the parties and witnesses have precluded the completion of depositions necessary to complete discovery.
3. The parties anticipate that all necessary depositions can be completed within the extension requested.
4. No trial date has been set in this matter; thus, the requested extension will not cause a postponement of any scheduled trial date or conferences with the Court.

For the reasons set forth above, the parties request the Court to extend the existing discovery deadline and the date for the filing of the status report from February 26 until March

31, 2004, to extend the date for filing requests for admissions from March 4 until April 7, 2004
and to extend the deadline for filing dispositive motions from March 29 to April 30, 2004.

Respectfully submitted,

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